

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
<b>KHALIF TUGGLE</b>	:	<b>VIOLATIONS:</b>
a/k/a "Khalif Tuggles,"	:	18 U.S.C. § 2119 (carjacking – 1 count)
a/k/a "Khalif Downing"	:	18 U.S.C. § 924(c)(1)(A) (use of a firearm in furtherance of a crime of violence – 1 count)
	:	18 U.S.C. § 924(j)(1) (murder in the course of using and carrying a firearm – 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

**THE GRAND JURY CHARGES THAT:**

On or about January 24, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KHALIF TUGGLE,  
a/k/a "Khalif Tuggles,"  
a/k/a "Khalif Downing,"**

and a person unknown to the grand jury, with intent to cause death and serious bodily harm, took, and aided and abetted the taking, from the person and presence of T.P., now deceased, by force and violence, and by intimidation, of a motor vehicle, that is, a Ford Taurus, VIN 1FAFP55U73A127783, license plate PA KHC-2226, that had been transported, shipped, and received in interstate commerce.

All in violation of Title 18, United States Code, Sections 2119 and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 24, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KHALIF TUGGLE,  
a/k/a “Khalif Tuggles,”  
a/k/a “Khalif Downing,”**

knowingly carried, used, and discharged a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

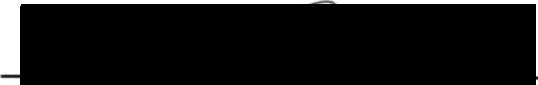
On or about January 24, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KHALIF TUGGLE,  
a/k/a "Khalif Tuggles,"  
a/k/a "Khalif Downing,"**

knowingly carried, used, and discharged a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the carjacking of a vehicle that had travelled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this indictment, and in the course of this violation caused the death of a person through the use of that firearm, which killing was a murder, as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, unlawfully killed T.P., willfully, deliberately, maliciously, and with premeditation.

All in violation of Title 18, United States Code, Section 924(j)(1).

**A TRUE BILL:**

  
GRAND JURY FOREPERSON

  
WILLIAM M. MCSWAIN  
United States Attorney

No. \_\_\_\_\_

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UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

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THE UNITED STATES OF AMERICA

vs.

KHALIF TUGGLE,  
a/k/a "Khalif Tuggles,"  
a/k/a "Khalif Downing"

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INDICTMENT

Counts

18 U.S.C. § 2119 (carjacking – 1 count); 18 U.S.C. § 924(c)(1)(A) (use of a firearm in  
furtherance of a crime of violence – 1 count); 18 U.S.C. § 924(j)(1) (murder in the  
course of using and carrying a firearm – 1 count); 18 U.S.C. § 2 (aiding and abetting)

[REDACTED]

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Filed in open court this \_\_\_\_\_ day  
of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_